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November 7, 2022

VIA ECF

Honorable Zahid N. Quraishi, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Federal Building
402 East State Street
Trenton, NJ 08608

Re: Dr. Reddy's Laboratories Inc. v. Amarin Pharma, Inc., et al No. 21-10309 (ZNQ)(RLS)

Dear Judge Quraishi:

This firm, together with Wilson Sonsini Goodrich & Rosati P.C., represents Plaintiff Dr. Reddy's Laboratories Inc. ("DRL") in the above-captioned litigation. We write with regard to the Court's October 27, 2022 Order (D.I. 82). That Order denied Defendant Amarin's motion to dismiss with regard to DRL's antitrust claims, granted Amarin's motion to dismiss with regard to DRL's tortious interference claim (Count VI of DRL's Complaint, D.I. 1), and granted DRL leave to amend Count VI within 30 days.

Based on the dismissal of DRL's tortious interference claim the Court has apparently found that the currently-available alleged facts are not sufficient to sustain the claim at this time. Discovery in this case has not yet started but will commence soon and presumably the Parties and the Court will enter into a scheduling order in the near future as well. We have reviewed the allegations in Count VI of the DRL Complaint and believe that the best way to amplify the facts to replead the tortious interference claim in more detail is to obtain discovery from Amarin and the relevant third parties mentioned in Count VI. The only source of certain key additional facts would primarily be Amarin. Such facts will likely not be available within 30 days of the date of the Order.

Thus, in order to proceed more efficiently and avoid unnecessary motion practice, DRL respectfully requests to include a provision in the forthcoming scheduling order whereby the Parties can seek to amend or supplement the pleadings (or add additional parties) on or near the close of fact discovery. Such provisions are common in scheduling orders and DRL asks that the

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Court include it in this case in order to allow the parties to fully develop any additional claims or defenses during the discovery period.

Therefore, in light of the Court's October 27, 2022 Order, in lieu of amending its Complaint by November 26, 2022, DRL respectfully requests that the Court not dismiss DRL's tortious interference claim with prejudice and allow Parties to seek to amend or supplement the pleadings within two weeks of the close of fact discovery as will be set forth in the forthcoming case schedule.

Respectfully Submitted,

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